

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
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LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
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**[PROPOSED] REVISED FIFTH STIPULATED CLAIMS LITIGATION AND PRE-
TRIAL SCHEDULE**

WHEREAS, on February 11, 2015, the Court so-ordered the Parties' stipulated Claims Litigation Schedule for the Objection of Debtors and Debtors in Possession to the Claims of QVT Fund LP and Quintessence Fund L.P. (collectively, "QVT") [Docket No. 48190];

WHEREAS, on October 19, 2015, the Court so-ordered the Parties' stipulated Revised Second Stipulated Claims Litigation Schedule [Docket No. 51209];

WHEREAS, on September 20, 2016, the Court so-ordered the Parties' stipulated Revised Third Stipulated Claims Litigation Schedule [Docket No. 53687];

WHEREAS, on November 4, 2016, the Court so-ordered the Parties' Stipulated Claims Litigation and Pre-Trial Schedule [Docket No. 53878] (the "Claims Litigation Schedule");

WHEREAS, the Parties have met and conferred and agreed to modify various deadlines in the Claims Litigation Schedule,

NOW, THEREFORE, the Parties hereby stipulate and agree to modify the Claims Litigation Schedule as follows:

1. The parties shall serve any rebuttal expert reports on January 6, 2017.

2. The deadline for the parties to exchange deposition designations shall be January 9, 2017.

3. The deadline for the parties to exchange witness lists shall be January 10, 2017.

4. The preliminary pre-trial conference shall be January 11, 2017 at 2:00 PM.

5. The deadline for the parties to exchange exhibit lists and proposed exhibits shall be January 12, 2017.

6. The deadline for the parties to exchange objections to proposed exhibits shall be January 16, 2017.

7. The deadline for the parties to exchange deposition counter-designations shall be January 16, 2017.

8. Depositions of experts disclosed pursuant to paragraph 1 must be completed no later than January 20, 2017.

9. The deadline for the parties to exchange a proposed joint statement of uncontested facts shall be January 23, 2017.

10. The deadline for the parties to submit consolidated pre-hearing briefs (including Daubert and in limine arguments), which are subject to a 60 page limit, shall be January 24, 2017.

11. The deadline for the parties to submit final witness lists to the Court shall be January 24, 2017.

12. The final pretrial conference shall be held on January 25, 2017 at 10:00 AM.

13. The deadline for the parties to submit exhibit lists and pre-marked exhibits, including joint exhibits, to the Court shall be January 26, 2017.

14. The deadline for the parties to submit a joint statement of uncontested facts to the Court shall be January 27, 2017.

15. The Claims Hearing regarding the Claims of QVT shall commence on January 30, 2017 and continue on the following dates: January 31, February 1, February 2, February 3, February 6, February 13, February 14, February 15, February 16, February 17, February 27 (morning only), February 28, March 1, March 2 (afternoon only), March 3, March 6, March 7, March 16, March 20, March 21, and March 23.

16. The deadline to submit deposition designations to the Court shall be April 12, 2017.

Dated: January 18, 2017
New York, New York

/s/ Laura Washington Sawyer

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Dated: January 18, 2017
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Dated: _____, 2017
New York, New York

SO ORDERED

UNITED STATES BANKRUPTCY JUDGE